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April 16, 2021

BY ECF

Hon. Vernon S. Broderick, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

APPLICATION GRANTED

SO ORDERED 

VERNON S. BRODERICK

U.S.D.J. 4/19/2021

Re: King v. Fedcap Rehabilitation Services, Inc., et al.,
Case No. 20-Civ-1784 (VSB) (DF)

Dear Judge Broderick:

We are counsel to Plaintiff in the above-captioned matter and write jointly with Defendants to respectfully request a two-week extension of the date by which to file the settlement agreement for fairness approval.

The parties agreed that Defendants will prepare a draft settlement agreement. Before Defendants were able to provide a draft agreement to Plaintiff, however, the Court rejected Plaintiff's Notice of Voluntary Dismissal and, on April 4, 2021, directed the parties to submit the settlement agreement to the Court for review and approval under *Cheeks* (Dkt. 30). In light of the Court's Order, Defendants have been considering the requirements under *Cheeks*. In addition, Defendants are considering terms of a draft settlement agreement that Plaintiff circulated on April 15, 2021. For the foregoing reasons, Plaintiff respectfully requests an additional two-week extension of the date by which to file the fairness submission, to May 3, 2021. This is the second request for an extension. Defendants consent to the extension.

We thank the Court for its kind consideration.

Respectfully,

/s/ Anne Seelig

Anne Seelig

cc: all parties via ECF